

Randall Scott Houston (“Dickerson”) and Brandon Houston (all together as the “Parties”), and hereby notifies the Court that the Parties have reached a settlement.

RRIG and Houston have resolved the issues concerning the purchase and sale agreement and dismissed the Texas state court action. The result of that resolution is that RRIG claims no interest in the suspense money held by Pioneer that accrued prior to May 1, 2022. On October 3, 2022, but effective as of May 1, 2022, RRIG, Houston, and Brandon Houston executed a Stipulation of Interest and Cross-Conveyance; Correction of Assignments (“Stipulation”) setting out their ownership of the subject interest. Further, from May 1, 2022 on, RRIG is entitled to fifty percent (50%) of Houston’s interest in the profits of mineral and royalty interests of oil and gas wells operated by Pioneer. In the Stipulation, Brandon Houston confirmed he does not contest RRIG’s interest it obtained from Houston pursuant to the PSA.

As a result of the resolution of the Texas lawsuit between RRIG and Houston, the execution of the Stipulation, and Brandon Houston’s agreement that he is not contesting or otherwise seeking to unwind the Texas settlement or any transaction between RRIG and Houston, there is no dispute concerning the property interests or royalty payments subject to this interpleader action, and the Parties have agreed to dismiss (or have already dismissed) all claims asserted in this interpleader action and in competing litigation between the Parties in Texas and Missouri with Prejudice.

Pioneer thus requests that the Court not delay in entry of a final judgment with respect to these issues.

Pioneer, therefore, respectfully requests that the Court enter the proposed final judgment filed herewith: (1) confirming the respective interests held by RRIG and Houston in the Properties managed by Pioneer; (2) disbursing fifty percent (50%) of the suspense money held by Pioneer beginning May 1, 2022 to RRIG; (3) disbursing 100% of the suspense money held by Pioneer

before May 1, 2022 and 50% of suspense money held by Pioneer beginning May 1, 2022 to Houston; (4) entitling Pioneer to recover \$8,000.00 out of suspended funds subject to this interpleader litigation as its reasonable and necessary attorney's fees; and (5) disposing of all affirmative claims asserted in this action with prejudice.

WHEREFORE, PREMISES CONSIDERED, Pioneer requests that the Court enter the agreed order, and all other relief to which it is entitled.

Date Submitted: October 7, 2022

Respectfully,

/s/ Jack Balderson, Jr.

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AGREED:

/s/ Conrad Hester (w/ permission)

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Scott Houston**

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the foregoing document has been served upon all counsel of record via the Court's electronic filing system on this 7th day of October, 2022.

/s/ Jack Balderson, Jr.
Jack Balderson